

Deverie J. Christensen  
Nevada State Bar No. 6596  
Daniel I. Aquino  
Nevada State Bar No. 12682  
**JACKSON LEWIS P.C.**  
300 S. Fourth Street, Suite 900  
Las Vegas, Nevada 89101  
Tel: (702) 921-2460  
Email: [deverie.christensen@jacksonlewis.com](mailto:deverie.christensen@jacksonlewis.com)  
[daniel.aquino@jacksonlewis.com](mailto:daniel.aquino@jacksonlewis.com)

*Attorneys for Defendants  
MGM Resorts International and  
Victoria Partners dba Park MGM*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

CHESTER L. ATHEY,  
  
Plaintiff,

vs.

MGM RESORTS INTERNATIONAL, a  
Foreign Corporation; MGM RESORTS  
INTERNATIONAL, as GENERAL  
PARTNER OF VICTORIA PARTNERS;  
ROE Business Organizations I-X; and DOE  
INDIVIDUALS I-X, Inclusive,  
  
Defendants.

Case No. 2:19-cv-01953-KJD-VCF

**STIPULATION TO EXTEND  
DEADLINE FOR DEFENDANTS TO  
RESPOND TO PLAINTIFF'S FIRST  
AMENDED COMPLAINT**

Second Request

IT IS HEREBY STIPULATED by and between Plaintiff Chester Athey ("Plaintiff"), through his counsel Kemp & Kemp, and Defendants MGM Resorts International and Victoria Partners dba Park MGM ("Defendants"), through their counsel Jackson Lewis P.C., that Defendants shall have up to and including Wednesday, December 18, 2019, in which to file a response to Plaintiff's First Amended Complaint. This Stipulation is submitted and based upon the following:

1. Defendants response to the First Amended Complaint is currently due on December 4, 2019.

2. An extension is necessary because Plaintiff's Counsel and Defense Counsel are continuing to work cooperatively to identify the correct entity or entities involved in Plaintiff's termination of employment from a Las Vegas Strip property formerly known as Monte Carlo Las Vegas Resort and Casino, which is currently operated by Victoria Partners dba Park MGM. Given the intervening Thanksgiving Holiday and travel out of state last week by both counsels, the Parties are continuing to share information to determine the proper defendant(s). The Parties seek to avoid unnecessary motions to dismiss regarding incorrectly named and sued entities. The Parties believe they can resolve these issues within this two-week extension.

3. This is the second request for an extension of time for Defendants to file a response to Plaintiff's First Amended Complaint.

4. This request is made in good faith and not for the purpose of delay.

5. Nothing in this Stipulation, nor the fact of entering to the same, shall be construed as waiving any claim and/or defense held by any party.

Dated this 27th day of November, 2019.

KEMP & KEMP

/s/ Victoria L. Neal

Victoria L. Neal, Bar No. 13382  
James P. Kemp, Bar No. 6375  
7435 W. Azure Drive, Ste. 110  
Las Vegas, Nevada 89130

*Attorneys for Plaintiff*

JACKSON LEWIS P.C.

/s/ Deverie J. Christensen

Deverie J. Christensen, Bar No. 6596  
Daniel I. Aquino, Bar No. 12682  
300 S. Fourth Street, Ste. 900  
Las Vegas, Nevada 89101

*Attorneys for Defendants*

**ORDER**

IT IS SO ORDERED:

  
United States Magistrate Judge

12-2-2019  
Dated: \_\_\_\_\_